

REMARKS

Reconsideration and allowance of the subject application are respectfully requested.

Applicants submit herewith an Information Disclosure Statement formally citing and providing copies of the 16 references [1]-[16] cited on pages 34 and 35 of the patent specification. Consideration is respectfully requested.

Regarding the election, the Examiner has withdrawn claims 63-68 from further consideration. However, Applicants respectfully point out that these claims were made dependent from claim 44 with the intention that the Examiner include them for examination in this application. As explained in the election, generic claim 44 defines the tamper-resistant security device with dependent claim 64 defining the user terminal that uses that tamper-resistant security device and dependent claim 77 defining a server that interacts with the tamper-resistant security device. Accordingly, claims 63-78 should be included in the examination in this application.

Claim 52 stands rejected under 35 USC §112, second paragraph, with the Examiner noting antecedent basis issues. Amendments made to claim 52 to overcome this rejection.

Claim 44 stands rejected under 35 USC §102(b) as being anticipated by U.S. Patent 5,757,918 to Hopkins. This rejection is respectfully traversed.

In the amendment, the subject matter of dependent claim 45 has been incorporated into claim 44, thereby rendering this rejection moot.

Claims 44-59 and 61 stand rejected under 35 USC §102(b) as being anticipated by a Wireless Identity Module protocol document referred to by the Examiner as WIM. This rejection is respectfully traversed.

The WIM reference describes a tamper-resistant security device with a memory for storing user credentials like a security key and an AKA-module for performing AKA processing with the security key. WIM defines an interface between part of a WAP client device and the tamper-resistant security device, i.e., WIM defines an **external** interface to the security device. Page 63 of the WIM-document discloses a card (mapped to a tamper-resistant security device) incorporating a WIM-application and other applications so that these applications are protected and executed in a tamper-resistant environment. But there is no disclosure in WIM of an **internal** interface between the other applications or the WIM-application and the AKA-module. Input to and output from the WIM-application and the other applications are directed over the external interface to the tamper-resistant security device for processing by the WIM-application or other applications.

The claimed application interface internal to the tamper-resistant device is for communication internally between an AKA-module and a cooperating application that performs enhanced security processing. The Examiner's attention is directed to the non-limiting example embodiments shown in Figures 3 and 4, where in addition to the external ME-SIM interface, there is an internal interface between the cooperating application and the AKA module for enhanced pre- or post-security processing of at least one AKA-related parameter.

For claim 45, the Examiner contends that WIM teaches enhances security processing pointing to the PKCS15 information structure. But WIM fails to disclose that a PKI

functionality cooperates with WIM security module to perform enhanced security processing.

Merely using a PKI operation (e.g., a creating an electronic signature) is not the same as providing a security-enhanced version of the PKI operation. Claim 44 describes a device for pre- or post-processing of AKA-related security information in order to enhance the security of the AKA.

Regarding claim 51, Examiner contends that WIM teaches performing security policy processing based on information representative of security conditions in relation to the tamper-resistant security device. However, as quoted by the Examiner, WIM only teaches that businesses can enforce certain requirements and policies using PKI-based mechanisms. There is no mention of information indicative of security conditions in relation to the tamper-resistant security device or how such information may be obtained.

Claims 44, 51, and 54 stand rejected under 35 USC §102(b) as being anticipated by WO 00/48416 to Vatanen. This rejection is respectfully traversed.

As explained above with respect to Hopkins, claim 44 now incorporates the subject matter of claim 45, and therefore, this rejection is moot.

Given the deficiencies noted with respect to the primary references, there is no need to address the rejections of dependent claim 60 and 62 based upon WIM in view of secondary references.

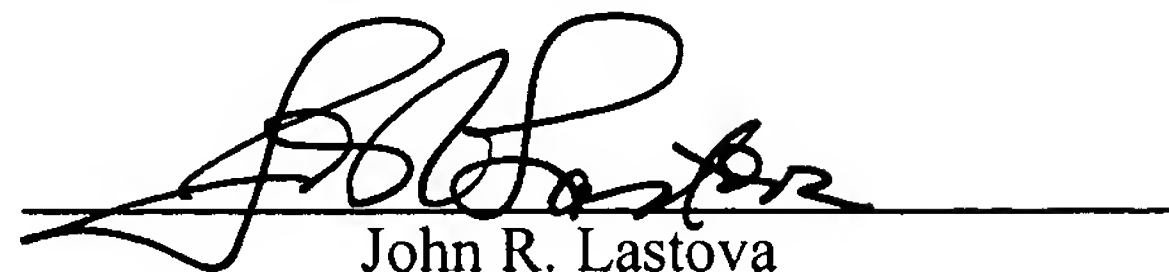
The application is in condition for allowance. An early notice to that effect is earnestly solicited.

NASLUND et al.
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Respectfully submitted,

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